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EX PARTE OR LATE FILED

October 2, 1998

HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Docket No. RM9108
Ex Parte Presentation

Dear Ms. Roman Salas:

Pursuant to Section 1.1206 of the Commission's rules, this is to advise you that, in my capacity as counsel to Long Distance International Inc. ("LDI"), a provider of 1010XXX service, I, along with representatives of LDI and my associate, Renée Roland Crittendon, met today with Dorothy Attwood, Chief, Enforcement Division, Common Carrier Bureau, and members of her staff.

Also present at this meeting were LDI representatives, Paul Freels, Vice President Operations, and Randy Sue Valove, Director Regulatory Affairs; Billing Concepts representative, Paul Gehri, Sr. Vice President Sales Corporate; and Enforcement Division staff, Gregory Weiss, Deputy Chief, Colleen Heitkamp, Senior Attorney, and Darius Withers, Staff Attorney.

During this meeting, we discussed LDI's position with respect to the inability of interexchange carriers to identify incumbent local exchange carriers or competitive local exchange carriers for casual calls. In follow-up to this meeting, copies of the following enclosures are being forwarded to Ms. Attwood:

- An LDI memorandum entitled, "Casual Calling Problem";

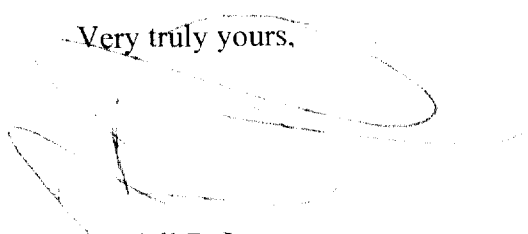
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Magalie Roman Salas
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- A *Communications Update* issued by MCI WorldCom entitled "Action Will Affect CLECs, TELCOs Who Do Not Provide Billing and Collection Information to MCI WorldCom"; and
- A graph entitled "Return Code 50 Losses" which is data collected by Billing Concepts from their experience concerning this issue.

In accordance with the Commission's rules, I am hereby submitting one original and one copy of this letter and its enclosures for the above-referenced proceeding.

Very truly yours,



Randall B. Lowe
Counsel for Long Distance International Inc.

Enclosures

cc: (w/enclosures)

Larry Strickling
Dorothy Attwood
Gregory Weiss
Colleen Heitkamp
Darius Withers
Mary Brown

CASUAL CALLING PROBLEM

PROBLEM

- The inability of interexchange carriers ("IXCs") to identify the incumbent local exchange carrier ("ILEC") or competitive local exchange carrier ("CLEC") for casual calls (*i.e.*, 1010XXX, 0⁺, 0⁻) thereby not allowing IXCs to determine whether it has a billing arrangement with the ILEC or CLEC which has the potential of encouraging consumer fraud.

REASON

- With the introduction of competition to the local exchange and associated policies such as resale and local number portability, NPA-NXXs can no longer be identified with a particular ILEC or CLEC.

SOLUTIONS

- A ten-digit line number data base, such as LIDB, that identifies an ILEC and CLEC.
- Require cost effective, non-discriminatory billing solutions, *i.e.*, require each LEC to offer billing and collection services at a reasonable prices.
- Realizing that the implementation of a ten digit line number data base may be time consuming, as an interim measure, require ILECs and CLECs to provide IXCs with a means by which to identify telephone numbers which they serve and, if necessary, protect such information by treating it as consumer proprietary network information. (47 U.S.C. § 222 (b), (c) 1996; 47 C.F.R. § 64.2005).

CONCLUSION

- Absent an interim or long-term solution, customer choice through casual calling will become unavailable thus resulting in IXCs being forced to block such calls. In the process, the growth of ILECs, CLECs and IXCs will be inhibited.

MCIWORLDCOM

Wholesale Services

Communications Update

ACTION WILL AFFECT CLECS, TELCOS WHO DO NOT PROVIDE BILLING AND COLLECTION INFORMATION TO MCI WORLDCOM

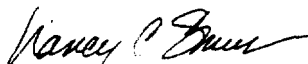
Currently, MCI WorldCom network completes all calls where end users PIC themselves or dial 1010-555 for long distance service. However, beginning Monday, September 21, 1998, calls originating from NPA/NXXs belonging to CLECs or independent telcos that do not provide billing and collection services to MCI WorldCom or its third party intermediaries will be blocked.

ANIs that fall in this category will not be operational until they are processed. We encourage our customers to discontinue instructing end users to PIC themselves or dial 1010-555 before their orders are processed. The affected NPA/NXXs are in the public file area of our BBS with the file name *nocasual.txt*.

MCI WorldCom has made this decision after much study. We will make every effort to provision new customers without delay so that end users will be transitioned smoothly. If you have any questions, please contact the International Customer Service Center at the numbers shown below.



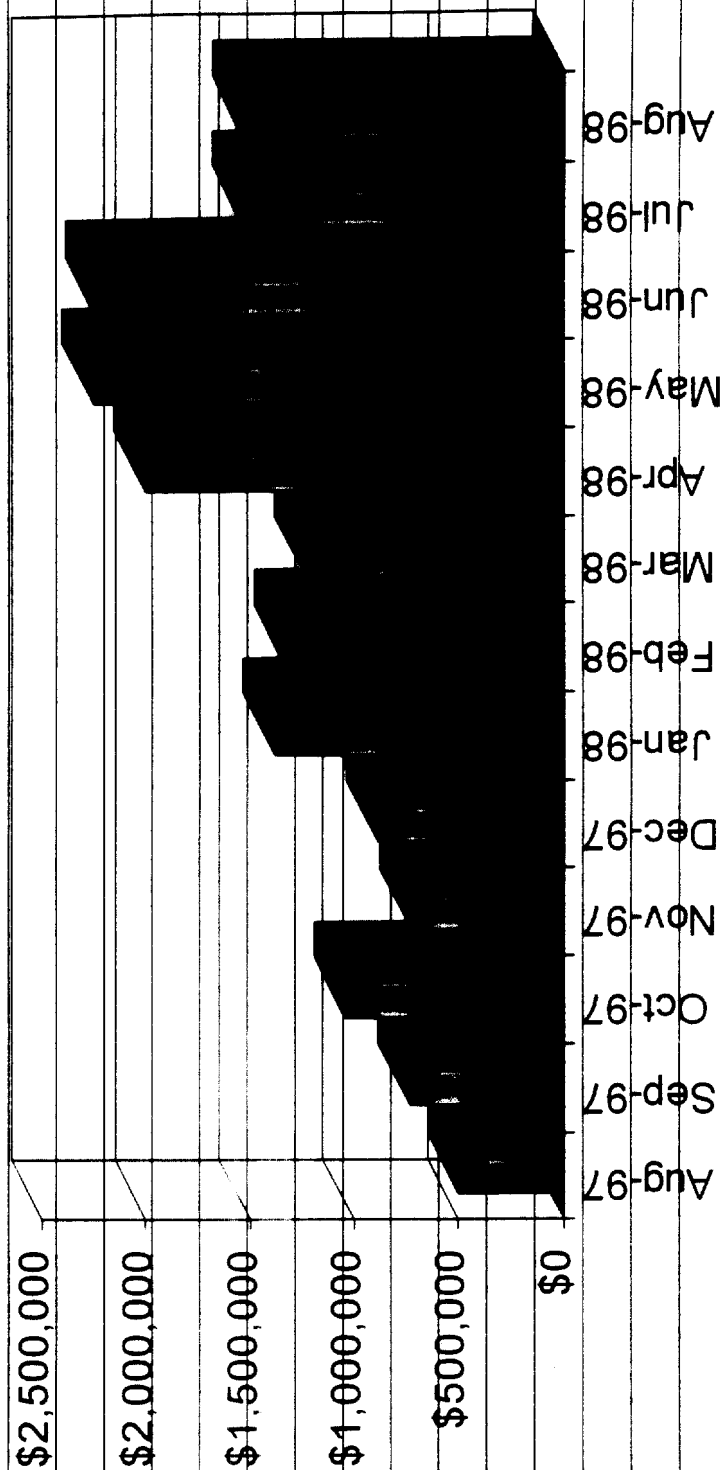
Nancy B. Keeney
Vice President
Reseller and Network Support



Nancy C. Smith
Vice President
Carrier Customer Support

| | | |
|--------------------------------|---------------------------------|---------------------------------------|
| Carrier: (800) 828-4984 | Reseller: (800) 864-4040 | DEX platform: (800) 830-6833 |
| Pages: 1 | Date: 9/17/98 | Our Fax Number: (918) 562-5084 |

Return Code 50 Losses



■ Zero Plus ■ One Plus